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US DISTRICT COURT E.D.N.Y.

★ DEC 06 2017 ★

BROOKLYN OFFICE

JD:EMR  
F. #2017R01760

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- against -

KEITH LIWANAG,

Defendant.

- - - - - X

I N D I C T M E N T

Cr. **CR 17 677**

(T. 18, U.S.C., §§ 2251(a), 2251(e),  
2252(a)(2), 2252(a)(4)(B), 2252(b)(1),  
2252(b)(2), 2253(a), 2253(b), 2 and 3551 et  
seq.; T. 21, U.S.C., § 853(p))

**WEINSTEIN, J.**

THE GRAND JURY CHARGES:

**BLOOM, M.J.**

COUNT ONE

(Conspiracy to Sexually Exploit a Child)

1. In or about and between September 2016 and October 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant KEITH LIWANAG, together with others, did knowingly and intentionally conspire to employ, use, persuade, induce, entice and coerce a minor, to wit: John Doe, an individual whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using any means and facility of interstate and foreign commerce and which were in and affecting interstate and foreign commerce, which visual depictions were to be produced and transmitted using materials that had been mailed, shipped and transported in and affecting

interstate and foreign commerce, by any means, including by computer, and such visual depictions were to be transported using any means and facility of interstate and foreign commerce and which were to be in and affecting interstate and foreign commerce, contrary to Title 18, United States Code, Section 2251(a).

(Title 18, United States Code, Sections 2251(e) and 3551 et seq.)

COUNT TWO  
(Sexual Exploitation of a Child)

2. In or about and between September 2016 and October 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant KEITH LIWANAG, together with others, did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: John Doe, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using any means and facility of interstate and foreign commerce and which were in and affecting interstate and foreign commerce, which visual depictions were produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and such visual depictions were actually transported and transmitted using any means and facility of interstate and foreign commerce and which were in and affecting interstate and foreign commerce.

(Title 18, United States Code, Sections 2251(a), 2251(e), 2 and 3551 et seq.)

COUNT THREE  
(Receipt of Child Pornography)

3. On or about October 27, 2016, within the Eastern District of New York and elsewhere, the defendant KEITH LIWANAG did knowingly and intentionally receive one or more visual depictions, to wit: the images depicted in the following image files: (a) the image marked as Facebook ID# 1214956391880641; and (b) the image marked as Facebook ID# 1214959168547030, using a means and facility of interstate and foreign commerce and which visual depiction had been mailed, shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been mailed and so shipped and transported, by any means including by computer, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions were of such conduct.

(Title 18, United States Code, Sections 2252(a)(2), 2252(b)(1) and 3551 et seq.)

COUNT FOUR  
(Possession of Child Pornography)

4. On or about November 9, 2017, within the Eastern District of New York, the defendant KEITH LIWANAG did knowingly and intentionally possess matter containing one or more visual depictions, to wit: video images contained on an Apple iPhone 7 cellular phone, serial number SFPFCHG7Q, which visual depictions had been mailed, and shipped and transported using a means and facility of interstate and foreign commerce, in and affecting interstate and foreign commerce, and which were produced using materials

which had been mailed, and so shipped and transported by any means including by computer, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions were of such conduct.

(Title 18, United States Code, Sections 2252(a)(4)(B), 2252(b)(2) and 3551 et seq.)

#### CRIMINAL FORFEITURE ALLEGATION

5. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged in Counts One through Four, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2253(a), which requires the forfeiture of: (a) any visual depiction described in Section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Title 18, United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of such sections; (b) any property, real or personal, constituting, or traceable to, gross profits or other proceeds obtained from the offenses; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses, or any property traceable to such property, including, but not limited to the following:

(a) one (1) Apple iPhone 7 cellular phone, serial number  
SFPFCHG7Q;

(b) one (1) Inspiron laptop computer, serial number JL65D82; and

(c) one (1) Apple iMac Desktop computer, serial number

C02MG1XZF8J3; all seized from the defendant's residence on or about November 9, 2017.

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

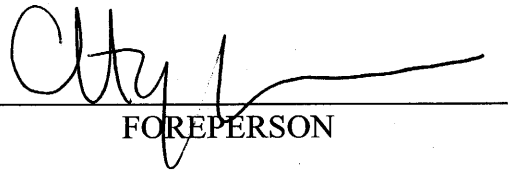
divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), to seek forfeiture of any

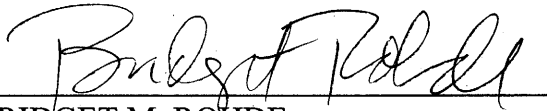
other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 2253(a) and 2253(b); Title 21, United States Code, Section 853(p))

A TRUE BILL



FOREPERSON



BRIDGET M. ROHDE  
ACTING UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

F. #2017R01760  
FORM DBD-34  
JUN. 85

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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**THE UNITED STATES OF AMERICA**

vs.

*KEITH LIWANAG,*

Defendant.

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**INDICTMENT**

(T. 18, U.S.C., §§ 2251(a), 2251(e), 2252(a)(2), 2252(a)(4)(B),  
2252(b)(1), 2252(b)(2), 2253, 2 and 3551 et seq.; T. 21, U.S.C., § 853(p))

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*A true bill.*



\_\_\_\_\_  
*Foreperson*

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*Filed in open court this* \_\_\_\_\_ *day,*

*of* \_\_\_\_\_ *A.D. 20* \_\_\_\_\_

\_\_\_\_\_  
*Clerk*

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*Bail, \$* \_\_\_\_\_

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*Erin Reid, Assistant U.S. Attorney (718) 254-6361*